

From: Andrea Ortiz
Subject: Reg E - Electronic Fund Transfer

Comments:

We are working on our Regulation E project and I have a question that needs clarifying. We may have instances where we need to contact our cardholders via telephone for the Opt-In to our ATM and One-Time Debit Card transactions. Typically this will occur after they have received the A-9 form in the mail and/or seen materials on our website. Can we obtain their Opt-In verbally as long as we send them the confirmation letter you have required us to send (that includes their option to revoke their choice) ? It seems that we would not be providing them good customer service if we contact them, have a conversation about their options, and then force them to mail in the A-9 form or go out to our Website for further consent.

Sincerely,

Andrea M. Ortiz
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